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Jason[Brush.Jason@epa.gov]; Scott_Richardson@fws.gov[Scott_Richardson@fws.gov]
From: Mary Walker
Sent: Tue 6/9/2015 8:42:43 PM
Subject: Please re-evaluate 404 permit for Villages at Vigneto

William Miller
District Engineer
Los Angeles District
U.S. Army Corps of Engineers

CC:
Sallie Diebolt, Chief, Arizona Branch, U.S. Army Corps of Engineers
Jason Brush, Regulatory Chief, Region IX, Environmental Protection Agency
Scott Richardson, Supervisory Fish & Wildlife Biologist, U.S. Fish and Wildlife Service

June 9, 2015

Dear Mr. Miller:

I request that the Army Corps of Engineers re-evaluate the Clean Water Act Section 404 permit for Whetstone Ranch issued to Whetstone Partners, L.L.C. (Permit #2003-00826-SDM) for the development now called The Villages at Vigneto. Further, I ask that you initiate consultation with the USFWS to establish the potential impacts of Vigneto Villages to threatened and endangered species and ensure commitments to adequate conservation and mitigation measures.

The current proposal for the Villages at Vigneto development far exceeds both the acreage and potential numbers of homes cited in the 2006 proposal, representing 50% more acreage and some 4,000 additional homes. The permit should be evaluated for compliance and re-opened to consider impacts to jurisdictional waters that are likely to be significantly more serious than in the original plan. The massive increase in project size, along with changed rainfall conditions and new scientific information that has become available in the past decade create a re-evaluation imperative.

The potential population explosion would dramatically impact the environment surrounding Benson, and the additional pumping of groundwater could significantly alter the San Pedro river system. The Corps approved the 2006 permit despite EPA's strong and clear objections, without resolving the issues identified by the EPA. Since then drought conditions have continued, and future mega-droughts driven by climate change may exacerbate the decline of the important water resources of the river and its riparian areas. The third part of a three-part USGS water study of the San Pedro Valley has yet to be completed. That study will add important information concerning the impacts of the development.

The San Pedro River is a river of national importance. Endangered and threatened wildlife in the area include jaguars and ocelots as well as birds. The American Bird Conservancy recognized the San Pedro as its first "globally important bird area" in the United States, dubbing it the "largest and best example of riparian woodland remaining" in the Southwest. Millions of songbirds depend upon the riparian area of the river every year as they migrate to and from their wintering grounds in Central America and Mexico and their summer breeding grounds in Canada and the northern United States. The river is an Arizona, United States and world treasure that deserves the utmost protection.

Downstream from Vigneto on the San Pedro River there are many important conservation areas and riparian mitigation properties. To sustain these vital conservation sites and tourist destinations the river must provide sufficient water quantity and quality. Large increases in groundwater pumping in the area could degrade the river to the extent that it becomes an intermittent water resource and could deplete the ecological values that contribute to the public good and the ecosystem services that this unique watershed provides.

Please give my concerns complete consideration, and direct the re-evaluation of Permit #2003-00826-SDM.

Very truly yours,

Mary M. Walker

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